IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA

Roanoke Division

OPHELIA AZRIEL DE'LONTA,)
Plaintiff,)
)
v.) Civil Action No. 7:11cv00483
)
HAROLD CLARKE, <u>et al</u> .,)
Defendants.)

DEFENDANT'S ANSWERS TO PLAINTIFF'S FIRST INTERROGATORIES

COMES NOW Defendant, Sarah Pankey Pruitt, by counsel, and provides the following answers to plaintiff's first interrogatories for the above-styled matter.

- 1) How long have you known Ophelia De'Lonta? Answer: I met Ophelia De'Lonta at Nottoway Correctional Center. I worked at Nottoway on or about June 1997 to November 2004. I do not remember the exact date that I first met Ophelia De'lonta
- 2) Have you worked at any other facility besides Buckingham Correctional Center while Ophelia De'Lonta was housed there? Answer: Yes. Nottoway Correctional Center
- 3) Where (sic) you ever assigned to housing unit B-1 & 2 at Buckingham Correctional Center? Answer: Yes
- 4) Did you ever go to Ophelia De'lonta's cell? Answer: Yes
- 5) How many times did you send Ophelia De'lonta money? Answer: Never
- 6) Describe your relationship with Ralph Mayo, of Meherrin, Virginia? Answer: Not relevant. Ralph Mayo is an acquaintance that I have known for a number of years. My relationship with Ralph Mayo has no relationship to this matter.

- 7) Why were you terminated after the investigation by Special Agent T. Watson? Answer: My separation from the Virginia Department of Corrections was unrelated to the investigation by Agent T. Watson regarding the allegations brought by Ophelia De'lonta against me.
- 8) How many times did you grope and fondled (sic) Ophelia De'lonta? Answer:

 Never

Respectfully submitted,

SARAH PANKEY PRUITT

By: s/ A. Pierre Jackson

A. Pierre Jackson, VSB #35999 POB 849 Hampden Sydney, VA 23943 (434) 392-6518 Fax# (434) 392-6518 apierre100@yahoo.com

CERTIFICATION

I hereby certify that I electronically filed the foregoing Defendant's Answers to Plaintiff's First Interrogatories with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following CM/ECF participant: J. Michael Parsons, Esq., Office of the Attorney, Public Safety & Enforcement Division, 900 East Main Street, Richmond, Virginia 23219 on this 4th day of February, 2013 and I hereby certify that a true and accurate copy of the foregoing was mailed or hand delivered to the non-CM/ECF participant: pro se Plaintiff, Ophelia Azriel De'lonta, #1014174, Buckingham Correctional Center POB 430, Dillwyn, VA 23936 on the 5th day of February, 2013.

By: s/ A. Pierre Jackson

A. Pierre Jackson, VSB #35999 POB 849 Hampden Sydney, VA 23943 (434) 392-6518 Fax# (434) 392-6518 apierre100@yahoo.com